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OFFICE OF THE SECRETARY

· Monmouth at the Millennium ·

MONMOUTH UNIVERSITY

February 9, 2000

Ms. Kris Monteith
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C122
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Ms. Monteith:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Monmouth University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Monmouth University to significant financial liability that would undermine our ongoing effort to provide educational services.

Monmouth University currently has over 5500 students and over 1000 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by

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Monmouth University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

David J. Bopp, Director
Telecommunications & Network Operations

cc: Magalie Roman Salas, Secretary

West Long Branch, New Jersey 07764 • Phone: (732) 571-3451 • Fax: (732) 263-5200

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 9, 2000

Chariman William E. Kennard
Federal Communications Commission
Room 8-B201
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Chairman Kennard:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Monmouth University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Monmouth University to significant financial liability that would undermine our ongoing effort to provide educational services.

Monmouth University currently has over 5500 students and over 1000 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by [name of institution]. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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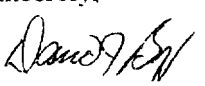
West Long Branch, New Jersey 07764 • Phone: (732) 571-3451 • Fax: (732) 263-5200

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



David J. Bopp, Director
Telecommunications & Network Operations

cc: Magalie Roman Salas, Secretary
Mr. Ari Fitzgerald, Legal Advisor to Chariman Kennard

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UNIVERSITY OF CALIFORNIA

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February 10, 2000

James D. Schlichting
Deputy Bureau Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Office of the Secretary
Room 8-C252
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA, the Association of Telecommunications Professionals in Higher Education, the University of California has followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the University of California to significant financial liability that would undermine our ongoing effort to provide educational services.

The University of California currently has over 170,000 full-and part-time students and 140,000 full and part time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees at our nine campuses place telephone calls from extensions in campus buildings that are routed through centralized PBX or telephone company Centrex systems administered by the telecommunications departments at each campus. Our existing telephone systems can be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications departments to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not

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use the same type of numbering scheme as toll calls under the North American Numbering Plan, our telephone systems will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by University of California campuses. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on campus budgets.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. The University of Califonia supports the numbering solution advocated by ACUTA as the most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls. Specific Service Access Codes ("SACs") should be assigned only to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution could also save the considerable expense and disruption of replacing the PBX systems currently in use with costly,next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campuses wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning unique SAC's to all CPP numbers.

We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Michael Shannon
Manager, Telecommunications Services

cc: Magalie Roman Salas

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CHAMPLAIN COLLEGE
Vice President of the College

February 10, 2000

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Mr. Thomas Sugrue
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C252
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

202 418-0787

Dear Mr. Sugrue,

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Champlain College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Champlain College to significant financial liability that would undermine our ongoing effort to provide educational services.

Champlain College currently has over 1,475 students and 170 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear

163 So. Willard Street, P.O. Box 670 • Burlington, Vermont 05402-0670
Voice (802) 860-2760 • Fax (802) 860-2765

the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne Champlain College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely yours,

Lawrence J. Veladota
Vice President of the College

LJV/kwh

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CLARK UNIVERSITY
950 Main Street Worcester Massachusetts 01610-1477

Telecommunications Department Telephone (508) 793-7381

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February 10, 2000

Mr. James D. Schlichting
Deputy Bureau Chief,
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Clark University has closely followed the Calling Party Pays ("CPP") rule making proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Clark University to significant financial liability that would undermine our ongoing effort to provide educational services.

Clark University currently has over 3,000 full-and part-time students and 800 full and part time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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CLARK UNIVERSITY
950 Main Street Worcester Massachusetts 01610-1477

Telecommunications Department Telephone (508) 793-7381

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Clark University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Paul Bottis, Jr.

Paul Bottis, Jr.
Director of Telecommunications

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EASTERN WASHINGTON UNIVERSITY
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February 9, 2000

Mr. James D. Schlichting
Deputy Bureau Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 3 – C254
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Eastern Washington University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution, deeply concerned that without appropriate safeguards, CPP will expose Eastern Washington University to significant financial liability that would undermine our ongoing effort to provide educational services.

Eastern Washington University currently has over 7,500 full-time and part-time students and 1,400 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our long distance service to bill the individual caller for his/her toll charges. If a new type of tollcall is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of

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which will ultimately be borne by Eastern Washington University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

William D. Kelley
Director of University Computing and Telecommunications

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Office of the President · Box 70734 · Johnson City, Tennessee 37614-0734

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February 10, 2000

Mr. James D. Schlichting, Deputy Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA (the Association of Telecommunications Professionals in Higher Education), East Tennessee State University (ETSU) has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a nonprofit educational institution deeply concerned that without appropriate safeguards, CPP will expose ETSU to significant financial liability that would undermine our ongoing effort to provide educational services.

ETSU currently has over 11,200 students and 2,000 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the Office of Information Technology. Our existing PBXs can easily be programmed to block or track call detail for a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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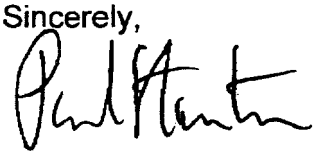
We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by ETSU. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a nonprofit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the reallocation of financial responsibility caused by CPP, the importance of enabling subscribers to block or track CPP calls is undeniable. The Commission would best serve the public interest--and accommodate the needs of educational institutions such as ours--by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Paul E. Stanton, Jr.
President

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OFFICE OF THE SECRETARY

OFFICE OF THE PRESIDENT

February 10, 2000

Mr. James D. Schlichting
Deputy Bureau Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room: 3-C254
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Furman University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Furman University to significant financial liability that would undermine our ongoing effort to provide educational services.

Furman University currently has over 2,600 students and 700 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBX can be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes which calls are toll calls and knows to block such calls unless an authorization code has been supplied. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by

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FURMAN UNIVERSITY • 3300 POINSETT HIGHWAY • GREENVILLE, SOUTH CAROLINA 29613-6162
TELEPHONE 864-294-2100 • FAX 864-294-3939 • E-MAIL david.shi@furman.edu

itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will be borne ultimately by Furman University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBX could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBX we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

David E. Shi
President

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Indiana State University

Office of the Provost and Vice President for Academic Affairs

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 10, 2000

Mr. James D. Schlichting
Deputy Bureau Chief,
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, S.W.
Washington, DC 20554
(202)418-0787

Dear Mr. Schlichting:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE COMMERCIAL MOBILE RADIO SERVICES

As a member of ACUTA, Indiana State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institution and are deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our ongoing effort to provide educational services.

Indiana State University currently has almost 12,000 students and over 1,500 employees. We have an extensive telephone infrastructure readily accessible to this large number of student and employee users. Because of this, we face the very real threat of uncontrollable, unauthorized CPP calls for which the University would be liable.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a PBX owned and controlled by the University. Our PBX can easily be programmed to block or track call detail for a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (e.g., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from her or his dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables us to bill the individual caller for their toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the appropriate person.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. However, this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for the charges he or she incurred. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the taxpayers of the State of Indiana. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this

Terre Haute, Indiana 47809
(812) 237-2304
FAX: (812) 237-3607

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proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBX could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save Indiana State University the considerable expense and disruption of upgrading or replacing the PBX we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a nonprofit state supported educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Richard Wells

Richard H. Wells
Provost and Vice President
for Academic Affairs

RHW/kc

MIAMI UNIVERSITY

VICE PRESIDENT FOR FINANCE AND BUSINESS SERVICES

Oxford, Ohio 45056
(513) 529-4220

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. James D. Schlichting
Deputy Bureau Chief,
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 97-207:
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CCP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

Miami University currently has over 20,000 full- and part-time students and 4,000 full- and part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail, for a variety of calls such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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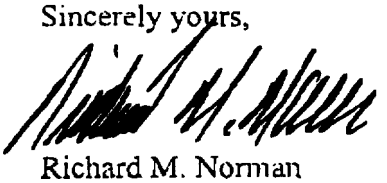
We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers, but this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will not be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Miami University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is to assign one or more identifiable Service Access Codes (SAC) to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block or track CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely yours,



Richard M. Norman
Vice President for Finance
and Business Services

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James D Schlichting
Deputy Bureau Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, SW
Washington, DC 20554

Fax - 202-418-0787

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FEB 10 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, New Mexico State University (NMSU) has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose NMSU to significant financial liability that would undermine our ongoing effort to provide educational services.

New Mexico State University currently has over 19,000 students and 2,800 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e. calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by NMSU. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and

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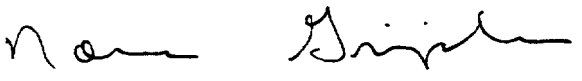
oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Norma Grijalva
Assistant Director
Computing and Networking Telecommunication Services
New Mexico State University

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ADMINISTRATION AND FINANCE
Office of the Vice President

February 10, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. James D. Schlichting
Deputy Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA (the Association of Telecommunications Professionals in Higher Education) the University of North Florida (UNF) has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose UNF to significant financial liability that would undermine our ongoing effort to provide educational services.

UNF currently has over 12,240 students and 1,702 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized local exchange controlled by the telecommunications department. Our local exchange can easily be programmed to block, or track call detail for, a variety of calls, such as toll calls and calls to pay-per-call services (i.e., calls to 900 numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the local exchange recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our local exchange will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the

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notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by UNF. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes (SAC) to CPP numbers. With very little effort, and at almost no cost, our central office could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Robert F. Fagin
Vice President, Administration & Finance

RFF:mid

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Southwest Missouri State
UNIVERSITY

February 10, 2000

Mr. James D. Schlichting
Deputy Bureau Chief,
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Southwest Missouri State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Southwest Missouri State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Southwest Missouri State University currently has over 17,000 students and 3,000 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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Communication Services
901 South National Avenue Springfield, Missouri 65804-0089 (417) 836-5100 Fax: (417) 836-6800

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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Southwest Missouri State University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest---and accommodate the needs of educational institutions such as ours---by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Tim Kilpatrick

Tim Kilpatrick
Director Communication Services

Information Services
Telecommunications Department

ORIGINAL

Wellesley College

Tel: (781) 283-3233
Fax: (781) 283-3686

Simpson Hall
106 Central Street
Wellesley, Massachusetts 02481-8203

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. James D. Schlichting
Deputy Bureau Chief
Federal Communications Commission
Room 3-C254
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Wellesley College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wellesley College to significant financial liability that would undermine our ongoing effort to provide educational services.

Wellesley College currently has over 2400 students and 1200 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Wellesley College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Sandra E. Roberts

Sandra E. Roberts
Director of Telecommunications

Information Services
Telecommunications Department

Wellesley College

Tel: (781) 283-3233
Fax: (781) 283-3686

Simpson Hall
106 Central Street
Wellesley, Massachusetts 02481-8203

February 10, 2000

Mr. James D. Schlichting
Deputy Bureau Chief
Federal Communications Commission
Room 3-C254
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Wellesley College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wellesley College to significant financial liability that would undermine our ongoing effort to provide educational services.

Wellesley College currently has over 2400 students and 1200 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Wellesley College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Sandra E. Roberts
Director of Telecommunications